

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 23-
v.	:	DATE FILED: July 18, 2023
KAMAL FATALIEV	:	VIOLATIONS:
	:	18 U.S.C. § 1001(a)(2) (false
	:	statements to government
		officials – 2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Federal Bureau of Investigation (“FBI”) was conducting an international terrorism investigation.
2. During the investigation, the FBI developed evidence that, from January 30, 2022 to February 20, 2022, defendant KAMAL FATALIEV posted over 200 files on an internet chat group (“Chat Group One”), known to the Grand Jury, and those files included manuals related to weapons, guerilla warfare, and the manufacture and use of explosives and toxins.
3. During the investigation, the FBI also developed evidence that defendant KAMAL FATALIEV formed another internet chat group (“Chat Group Two”), known to the Grand Jury, that he communicated with others through Chat Group Two, and that he shared information, including a manual describing bomb making techniques, through Chat Group Two

with another individual, Person One, known to the Grand Jury.

4. On May 26, 2023, FBI special agents interviewed defendant KAMAL FATALIEV during a search of his apartment. The agents warned defendant FATALIEV that it is a violation of federal law to lie to FBI special agents during the course of an investigation. During the interview that followed, defendant FATALIEV told the agents that he had formed Chat Group Two as a private group, that he did not allow anyone else into Chat Group Two, that every account in Chat Group Two belonged to him, and that he did not share any information with any other person through Chat Group Two.

5. On May 27, 2023, defendant KAMAL FATALIEV called the FBI special agents and asked to speak with them a second time. The agents met with defendant FATALIEV and reminded him that it is a violation of federal law to lie to FBI special agents during the course of an investigation. During the interview that followed, defendant FATALIEV told the agents that FATALIEV had not disseminated any manuals on Chat Group One. Defendant FATALIEV also repeated his claim that he was the sole member of Chat Group Two.

6. On or about May 27, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KAMAL FATALIEV,

in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the Executive Branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, in that defendant FATALIEV falsely stated to the FBI that he had never posted or shared materials in Chat Group One, when in fact FATALIEV then knew that, from January 30, 2022 to February 20, 2022, he posted numerous files to Chat Group One, including manuals related to weapons, guerilla warfare, and the manufacture of

explosives and toxins. The offense involved international terrorism.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO


THE GRAND JURY FURTHER CHARGES THAT:

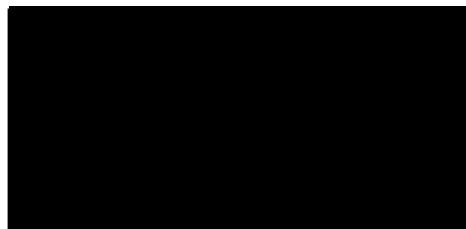
1. Paragraphs 1 – 5 of Count One are incorporated here.
2. On or about May 26, 2023 and May 27, 2023, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KAMAL FATALIEV,

in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the Executive Branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, in that defendant FATALIEV falsely stated to the FBI that he created Chat Group Two so that he was the sole individual permitted in Chat Group Two, that he never allowed anyone else into Chat Group Two, and that he never shared information with anyone in Chat Group Two, when in fact FATALIEV then knew that he had allowed other individuals to join Chat Group Two, and that he had communicated with Person One and other individuals in Chat Group Two. The offense involved international terrorism.

In violation of Title 18, United States Code, Section 1001(a)(2).


JACQUELINE C. ROMERO
UNITED STATES ATTORNEY



UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

Filed Under Seal

THE UNITED STATES OF AMERICA

vs.

KAMAL FATALIEV

INDICTMENT

Counts

18 U.S.C. § 1001(a)(2) (false statements to government
officials - 2 counts)

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